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AUG - 3 2004

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Rochester, NY
July 30, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive Room #1034
Alexandria, VA 22302

Dear Madam/Sirs:

Please consider my comments regarding the Food Guide Pyramid:

- 1) The "Milk..." group needs to be renamed the "Calcium" group with graphics emphasizing soymilk, green leafy vegetables, tofu, and legumes. Many people have lactose intolerance or avoid dairy products because of sinusitis or allergy problems. It is seemingly unfair for these people to avoid an entire food group.
- 2) The "Meat..." group needs to be renamed the "Bean" group with graphics illustrating beans and nuts, especially walnuts. Beans provide fiber and phytonutrients which are lacking in the typical American's diet. Again, many people abstain from eating meat because of its saturated fat and cholesterol, but it is imperative these people have selections as well.
- 3) The "Bread..." group needs to be renamed the "Grain" group emphasizing whole grains, not white bread, potatoes, and pasta. These items have no fiber and cause spikes in blood glucose postprandially. Instead, illustrate whole grains, barley, sweet potatoes, etc.
- 4) In the top triangle, omega 3 fatty acids and vitamin B12 should be emphasized. A better source than fish of these omega 3 fatty acids are flax seeds. Vitamin B12 can be found in abundance in nutritional yeast or fortified foods.

Thank you for your consideration.

Sincerely,

Jennifer Yates

Jennifer Yates, M.S.

Barry Krupnick

Brooklyn, NY

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AUG - 3 2004

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7/18/04

To:

The Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive Room #1034
Alexandria, VA 22302

Dear Madams/Sirs,

I would like to submit the following comments regarding the Food Guide Pyramid:

1. The "Milk..." group should be renamed the "Calcium" group, with emphasis and graphics showing non-dairy sources such as leafy green vegetables. Many individuals avoid dairy products for reasons of personal belief and health issues such as allergy and lactose intolerance. The latter problem, since it has strong ethnic variations, creates issues of racial bias in any food scheme that implies there is something "abnormal" about anyone who cannot tolerate a whole group of foods. Since both the fat in cow's milk and the principal protein, casein, have been shown to raise blood cholesterol in adults, it is prudent for public health reasons, to de-emphasize all milks, including low-fat versions.
2. The graphics in the "Meat..." group should emphasize beans and nuts more. These healthy foods provide fiber and other phytonutrients that meats do not. Other nuts besides peanuts (which are an allergy problem for many people, and as peanut butter, often have unhealthy trans fats added.), should be included and emphasized. Walnuts may be especially important to emphasize since they are rich in omega-3 fatty acids, which are often in short supply in American diets.
3. In both the "Fruit" and "Vegetable" groups, the use of juices should be de-emphasized or omitted altogether. Juices contain little or no fiber compared to the fruits and/or vegetables they are derived from, and therefore create a blood glucose spike in the body that can lead to Metabolic Syndrome, and ultimately diabetes, hypertension and/or heart disease.
4. The "Bread..." group should be renamed the Grain and/or Cereal group, with emphasis in graphics and text on whole grains, especially those other than wheat (which has no soluble fiber to regulate blood cholesterol and blood sugar.) More emphasis needs to go toward foods like oatmeal (but not the "Instant" products which don't provide full fiber benefit either,) barley, whole-grain rice, etc.

AUG - 3 2004

Darla K. Brunner

Tarzana, CA

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July 29, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: Revision of the Food Pyramid

Dear Team:

I am writing as a concerned citizen; I am not affiliated with any nutrition program or employed by anyone with an interest. I have no monetary reason to write – in other words, my opinion is completely unbiased.

I am 5'7" and weigh less than 120 pounds and I eat all I want. Blessed with good metabolism? Hardly – there have been times I have been overweight (I tried Atkins 20 years ago and knew in 24 hours you could starve or make yourself deathly ill on that diet!). In fact even now I watch my weight. But when my weight is up a little, I don't eat less food; I just eat more of the good stuff and less fattening desserts and snacks. That's why other people's "diets" fail – you just *can't* eat less food. It's like trying to breathe less; the hunger drive is too strong – you need to eat when you're hungry.

The Food Pyramid was a drastic step in the right direction! Don't take a step backwards and again advise people to load up on meat and dairy. It's NOT bread that's making people fat; it's the KIND of bread – refined flour – that's the problem. But this is not even as great a problem as the FAT in the diet, frequently delivered in the form of meat and dairy.

I live on a premise of Four Food Groups: 1) grains; 2) legumes (beans! – there are thousands of varieties!); 3) vegetables; 4) fruit. The rest is either pure garbage or strictly a treat food, such as nuts.

In addition to being high in fat and environmental contamination such as pesticides and hormones, meat and dairy is dangerously high in protein. This is causing the epidemic in Osteoporosis, among other ailments. Fat is linked to most forms of cancer and certainly heart disease, and is linked in studies to probably hundred of other ailments! There is just no reason to eat the stuff. When have you ever seen a study that reports vegetarians are dropping dead of malnutrition? Instead studies show that vegetarians are across-the-board healthier (unless they are living on Coke and potato chips, to be sure!).

Oh, but people LIKE meat and dairy! Maybe so – but it's not your job to tell people to eat what they *want* to eat. It's **your job to make recommendations as to the very best diet for optimal health**, and come on, guys, the evidence speaks for itself: superior health is promoted by a diet void of meat, dairy, oils, refined sugar and refined flour.

Who you gonna listen to? The meat and dairy industry? Or me? Heck no, look at the plethora of unbiased medical and nutritional research. Avoid like the plague so-called research paid for by multi-billion dollar industries that have much to gain by their products looking good. But you already knew that.

But it must be very hard to ignore the big money; I can only imagine. Please, for the sake of all Americans, I hope each Team member tries to do the right thing. You're on the right track with the Pyramid – just change the grain section to indicate whole grain pastas, cereals, bread and rice. Please continue to downplay meat and dairy – these clearly are "treat" foods – not health-promoting.

Thank you for your time.

Sincerely,

Darla Brunner
Darla K. Brunner

*P.S. Potatoes are good food! But not the
junk we put on them!*

AUG - 3 2004

Martha Berryhill

Hoover, AL
July 22, 2004

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Team,

I want to suggest that the issue of osteoporosis be addressed in this new pyramid. We now know that young adults absorb calcium into their bones until about the age of 30 to 35. (Previously, it was thought that adsorption stopped at about age 18 or 19.)

If more people had an appropriate amount of calcium, while their bones could still benefit from it, there would be much less osteoporosis when people get older. Since the population is aging at a very fast rate, this is something that would greatly benefit the general public of America.

It is my understanding that teens and young adults need 4 or more servings of milk each day, and that women over 50 need 4 or more servings daily. People with osteoporosis need 5 or more servings, just to be sure that no bone mass is lost. Please do enough research, from the valuable resources available to you, to get this right. It will help prevent spending many government dollars on broken bones and osteoporosis treatment in the future.

Do you plan to do a Physical Exercise Pyramid, too? If this isn't your department, it needs to be addressed at the same time so that the two pieces of information can go out together.

As a retired public school teacher (39 years) of Family and Consumer Sciences (Home Economics), I know how difficult it is to get young people to eat correctly. I would be interested in helping develop games and activities to use in teaching Nutrition and the Food Guide Pyramid. I believe that "fun" lessons are better received and remembered!

Sincerely,

Martha Berryhill

Martha Berryhill

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CARL OLSON

AUG - 3 2004

[Signature]

Woodland Hills, California

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1 OF 4

July 30, 2004

Director
Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive #1034
Alexandria, Virginia 22302

Dear Director:

This is a belated comment submission on the Food Guide Pyramid and the data supporting its contents.

The current Food Guide Pyramid leaves much to be desired in design, in content, and in usefulness for an average reader. There does not seem to be a consistent concept to it. It seems to be a compromised product of competing economic interests vying for space on a supermarket shelf without regard to objective scientific knowledge or public service.

1. Impossible to Discern Nutrients from the Pyramid

The Food Guide Pyramid seems to say that the various food groups must be consumed in various quantities without regard to the actual nutrients involved. The Pyramid does not convey any knowledge as to what nutrient is contained in which item in each of the food groups (each item has nutrients different from others in the same group or different in quantities or concentration). As such, it is a completely backwards view of nutrition.

2. Critique of the Existing Pyramid

A. The top group "Fats, Oils & Sweets" has a puzzling illustration, consisting a series of white dots on a dark background. It conveys no knowledge.

B. The category of "Fats, Oils & Sweets" has no obvious definition, since fats, oils, and sweets are contained in the other groups (vegetables, meats etc., fruit, and breads etc.). Hardly any fats/oils are consumed by themselves, except perhaps some oil-dominated salad dressings.

For instance, are the following in the "Fats, Oils & Sweets" and in the "Bread, etc.": doughnut, muffin, cookie, cake, scone, bun, sweet roll, biscuit, crumpet, Pop-Tart, turnover, Twinkie, pie, pancake, waffle, and crepe?

C. As for "sweets", does this include jam, jelly, marmalade, honey, and syrup? How about ketchup which has a large percentage of sugar?

D. The category of "Fats, Oils & Sweets" has a daily consumption of "sparingly" recommended. This is totally useless. In addition to being impossible to follow as to an optimum amount, it misleads one into thinking that the essential nutrients in fats, oils, and sweets are somehow so potent (or even dangerous/toxic) that a person has to consume them "sparingly".

E. The vegetable group appears to have a tomato in the illustration. Tomatoes are fruits—just ask any botanist. We should not continue to mis-educate the public.

F. If one adds up the number of recommended daily servings for all the food groups, the total ranges from 15 to 26. If we assume three meals a day, this means that the USDA and HHS are recommending that each meal average between 5 and 9 servings of foods. These could be enormous meals, especially on the high end of the recommendations; or it could mean that the "servings" are really very small; or something undefined else.

G. The "milk, yogurt & cheese group" has the odd product of "yogurt" in it. Yogurt is not a very widely consumed milk product and has no special nutrient content that demands to be promoted over other milk products, such as the more popular and palatable ice cream.

H. In the "meat etc. group" is the category dry beans. But how can one tell what a dry bean is in the "meat etc. group" as contrasted with not-dry bean in the vegetable group? Are soybeans a "dry bean"? Is tofu therefore in this group?

I. Gelatins are usually meat based. Are they in the "meat etc. group"? What about Jell-o type gelatins? What about aspic?

J. Are peanuts in the "meat etc. group", even though they are not nuts. (Nuts grow on trees.)

K. Are potato chips in the vegetable group? French fries too?

3. Missing Foods

A. How come there are no beverages other than milk? How about juices, coffee, tea, and alcoholic beverages?

B. What about salad dressing, sauces, gravies, whipped cream, and other toppings?

C. Is water itself a food?

D. What happened to vitamins and minerals?

4. Other Considerations

A. A food designation for "sodium" is preposterous. Nobody eats sodium. It is a metal that bursts into flames when it hits air or water. If the discussion is about sodium chloride (table salt), we should say so. Salt is an absolutely

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necessary nutrient. If there is any guidance for persons with already very high blood pressure, then that small group's concerns should not dominate the other 95%.

B. The idea of a "serving" is totally incomprehensible on the Food Guide Pyramid. If you consider the wide variation in labeling laws about "serving", it becomes apparent that nobody can easily use it.

C. If the Food Guide Pyramid is trying to convey how much of a food group to eat, it should use a volume measure, not a weight measure. Everybody can eyeball the volume, but nobody has any realistic way to measure the weight, whether in ounces or grams.

D. Obviously each size of person has a different optimum level of consumption of foods/nutrients. Perhaps there should be a series of pyramids, say one for 100 pounds, one for 150 pounds, and one for 200 pounds. They should be normalized for body mass index (BMI).

E. Good research has shown that a minimal intake of calories produces a significantly longer life span. We should be working to encourage this goal. A lean body mass index should be adopted as the optimum and all recommendations should be aimed at this.

F. The lack of definition of terms makes rational policy setting impossible and meaning-less. For instance, the September 10, 2003 News Release on revisions of the Food Guide Pyramid stated, "The Food Guide Pyramid is an educational tool to help Americans choose a healthy diet." But, no objective definition of "healthy diet" has ever been produced.

4. A Nutrient Guide Pyramid

A. If one is trying to give guidance to nutritional health, then one should be giving guidance about nutrients and where to find them in the necessary quantities.

B. Food groups have wide variations of nutrients. For instance, there are no common ingredients in vegetables other than cellulose. A Food Guide Pyramid is destined to fail miserably as a guide to nutrients.

C. A **Nutrient Guide Pyramid** should be established with the following groups:

1. Proteins (four types)
2. Fats, oils, lipids, cholesterol (both animal and vegetable)
3. Glucose (which is the one used by the body for metabolism), other sugars that convert to glucose (sucrose, dextrose, levulose, fructose, lactose), and starches that can be converted into glucose.
4. Vitamins and minerals, including salt. A daily tablet should be considered the prime source for vitamins and minerals, so that one need not try to patch together various foods with their unreliable content of vitamins and minerals. A

Olson 4 of 4

vitamin/mineral tablet should not be thought of as a "supplement", but rather the prime source with other foods as supplements.

5. Roughage (indigestible cellulose). Though not a nutrient to be absorbed, it is known that this bulk material helps promote the passage of food along the intestines and somehow deters the growth of intestinal tumors.

D. Recommended daily intakes for each of these nutrients should be established for various weight levels (BMI adjusted). These intakes should be reported by volume to make it easy for the public to understand (weights can be added).

E. Then, lists of food types can be compiled to go inside each of the nutrient categories. These food types would show how much of the RDA of nutrients is in a volume (such as a cup) of the food, and ranked by highest percentage to lowest. It would not matter which of the old Food Guide Pyramid categories each of the food types had been in. What is more important is that the food types be put into the nutrient categories that they contain. This way the consumer can instantly see which foods have the most of each nutrient in the volumes of food contemplated. True guidance will then be achieved. That's the whole purpose of the UDSA/HHS mission.

Apparently past constructions of the Food Guide Pyramid have descended into marketing battles between various food producers for access. It has not been public consumer oriented. A Nutrient Guide Pyramid would best serve the public interest.

Sincerely,



Carl Olson

Mrs. Tabitha M. Siqueira

Alabaster, AL

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

98

AUG - 3 2004

Siqueira

1 of 1

To Whom it May Concern,

My name is Tabitha Siqueira and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

A year ago on July 8th I started a low carbohydrate diet. I have followed the diet for over a year losing a total of 40 lbs, which now I am in my weight requirements for my frame and height. I eat many vegetables everyday mainly greens and I stay away from sugar. I feel better, look better, and have more energy then ever before. Now I am just maintaining my weight level, but still watching my carb intake.

I have always been over weight since I was a child. I feel that since my family was large and we were a lower income household that this led to an abundance of higher carb food. As we all know, the starches at the grocery are usually always the least expensive. I was also active as a child playing many sports through out the year. This was not enough for me even with the activity; my metabolism just was not fast enough.

My comments are as follows: I feel the Food Guide Pyramid encourages parents to feed there children more of the foods that cause obesity. This is what you have informed us as the healthy way to eat. As I see my mother feeding my little brother and to watch him have the same problem as I did during his younger years through college. I feel this guide needs to be re-accessed. He is eleven and not capable of deciding what he is to eat at this age. So who is going to inform others of the problems we have with negative carbs and breads. This is an epidemic in our society and obesity is just increasing. Help the United States overcome this by informing us of a better way to eat and staying balanced.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Tabitha M. Siqueira

Tabitha M. Siqueira

Richard Thomas

Fitchburg, WI

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Thomas
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AUG - 3 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

29 July 2004

After reading an article about the intense lobbying by food industries to mold your upcoming recommendations (today's *Wall Street Journal*), I am writing to strongly urge you to recommend vast reductions in carbohydrate intake for Americans.

I have struggled with weight issues for most of my life and nothing....NOTHING!...improved my overall health, mental well-being and helped me lose weight until I finally severely curbed my intake of the culprits: sugar, corn by-products (syrup, etc.), white flour, potatoes, and rice, all far below the amounts currently recommended by the U.S. government. I would assume that it is mostly these industries that are hanging outside your doors right now funded by billions of dollars, but PLEASE HEAR ME! Your job is to serve ME, the American public.

The U.S. recommendations are extraordinarily influential in many arenas: popular perception, medical guidance, and what industries produce, market and sell to the American public. Please be aware that finding my way to restriction of processed carbohydrates (as noted above) was an arduous journey under your current guidelines. If they had been different, my road to health and weight control would have wasted far less of my life.

No matter how much these industries spend on trying to sway you, please ignore them. They are merely corporations, granted the right to exist by we, the people. As evolutionary beasts they will find some other way to make money should you restrict their current avenues, for that is their nature. Attend to the public WELFARE...that is your mandate!

We all know that more exercise and fewer calories are a fundamental part of the equation, but that has been touted for 30 years. Just look around: have you ever seen more FAT Americans in your life? It's disgusting, sad and pathetic. Help them by being true. You know have a chance to help so many people. Please don't squander it by pandering to greedy lobbyists and their dirty money.

Very truly yours,

Richard E. Thomas

AUG - 3 2004

John and Brenda Deems

Salt Lake City, UT

July 27, 2004

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1 OF 1

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom it May Concern,

My name is Brenda Deems and my husband's name is John Deems. We're writing to share our thoughts on the USDA Food Guide Pyramid. Our comments are based on our experience controlling carbohydrates, which have helped us to regain control of our health and our weight. My husband John lost 30 pounds on a low carbohydrate food plan and I lost 10. Our cholesterol levels have improved both reducing our triglycerides and increasing our HDL good cholesterol. John has had high blood pressure but that too has improved. We are maintaining our weight loss with a reduced carbohydrate eating plan and without being hungry or feeling deprived as in other regimes.

We have used other eating plans to lose weight e.g. weight watchers, etc. but end up feeling hungry all the time. With the reduced carbohydrate plan, we feel more satisfied, are never hungry and have much more energy.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

John & Brenda Deems

John and Brenda Deems

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July 29, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

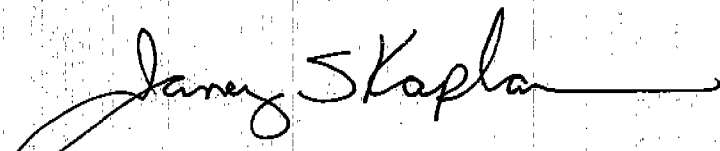
Re: New Food Pyramid

I am writing to ask that the new food pyramid embrace the low carbohydrate eating style as explained by Dr. Atkins. The current American diet is 80% refined flour, sugar and trans-fats. This diet is not good for anyone! The food pyramid should reflect the need for whole grains, unsaturated and mono-saturated oils, unprocessed meats, in fact all food choices should have as little processing as possible.

I was a 39-year-old female prosecuting attorney when I started Atkins one year ago. I had chronic infections and could not stay awake through my workday or my drive home. I had entered the lowest rating of obese, even though I exercised 3-5 times a week. Under Atkins, I lost 20 pounds (I am now 122 pounds). I have no trouble staying awake at work or driving home. My chronic sinus infections have stopped.

I have been dieting since I was 16. The low fat plans worked less and less well each time. By age 38, I was eating only whole grains and vegetables with almost no fat and still could not lose weight. (I even did the raw-food vegetarian diet.) Fat sates hunger. The need for protein and fat is biologically built into our bodies. Americans need to be informed of the huge health risks of white flour, sugar, trans-fats and processed meats. They should not be scared of hunger-sating fat or protein as found in unprocessed meats or dairy.

Sincerely


Jamey Kaplan